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September 17, 2018

**BY ECF**

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Hincapie v. City of New York*, 18 CV 3432 (PAC)

Your Honor:

I represent plaintiff in the above-referenced civil rights action. I write with defendants' consent to respectfully request a two-week extension of plaintiff's service deadline under Fed. R. Civ. P. 4(m).

This case challenges plaintiff's felony murder prosecution following the death of "Utah Tourist" Brian Watkins in 1990, plaintiff's 1992 conviction and the over twenty-five years that plaintiff spent incarcerated as a result. The matter was commenced on April 19, 2018. DE #1. With plaintiff's consent, defendant City of New York sought and obtained two extensions of its response deadline, which presently stands at September 21, 2018. DE #6, 11. At the same time, plaintiff has worked diligently to serve the individual defendants, with fourteen of them served as of this writing. DE #59-72. Under the current schedule, plaintiff's Rule 4(m) service deadline expires today.

With respect to the remaining individual defendants, plaintiff is working with Corporation Counsel to determine their true identities, obtain service addresses and ascertain which of them, if any, are deceased. If it should please the Court, plaintiff is hopeful that the instant proposed extension will allow sufficient time for that exchange of information to be completed and, if necessary, for the parties to jointly propose alternative arrangements to the Court.

Honorable Paul A. Crotty  
Sept. 17, 2018

In light of the foregoing, plaintiff respectfully requests, on consent, a two-week extension of his Fed. R. Civ. P. 4(m) service deadline from today to October 1, 2018.

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'G. Harvis', written over the typed name.

Gabriel P. Harvis

cc: All Counsel